

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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| In the Matter of the Wireline Competition |) | |
| Bureau Seeking Comment on a Petition |) | DA 07-1846 |
| By the State E-Rate Coordinators Alliance |) | |
| For Clarification and/or Waiver of E-Rate |) | CC Docket No. 02-6 |
| Rules Concerning Technology Plan |) | |
| Creation and Approval Under the Schools |) | |
| And Libraries Universal Service Support` |) | |
| Mechanism. |) | |

**Initial Comments
of
Montana Rural Education Association**

May 8, 2007

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The Montana Rural Education Association, PO Box 1612, Helena, Montana 59624, files these comments in support of the petition of the State E-rate Coordinators Alliance (SECA) for clarification and/or waiver of E-rate rules concerning technology plan creation and approval under the Schools and Libraries Universal Service support mechanism.

Specifically the SECA petition does a very good job of illustrating the problems associated with the requirement that technology plans must be created prior to the filing of a Form 470. The SECA petition suggests an appropriate remedy to the existing problems associated with the current procedures. The suggested action provides schools and libraries with a meaningful procedure that will enhance the use of E-rate funds and technology planning.

The Montana Rural Education Association is made up of rural school districts from across the state of Montana. Most of our member districts are small or medium sized schools and are somewhat isolated or remote from the larger urban areas of our state. The geographical location of our schools requires a dependence on technology to provide students with the same opportunities as those students in the larger cities. The integration of technology to increase the educational opportunities for our students requires careful planning and use of limited resources in conjunction with the other needed components. The E-rate program has been extremely helpful in

providing services to our students and staff and enhancing the education of students.

The current regulations that the SECA petition seeks to modify are unrealistic, cumbersome, and not in alignment with current planning cycles in our schools and libraries. Important school planning cycles completed every year include curriculum, budget, and personnel. These important decisions are currently concluded near the end of the school year in May or June in alignment with state laws and administrative rules. Current regulations require technology planning to be completed in the fall which removes it from integration with the other planning cycles in schools. The successful integration of technology into schools requires that planning be closely associated with budget, personnel, and curriculum. Technology planning should occur at the same time as curriculum planning to ensure the integration and application of technology into the curriculum and ultimately instruction. In addition, when planning a district budget, all considerations including technology and personnel are interrelated and should be considered together. Modifying the current regulations to allow the technology planning to be completed prior to expiration of a plan in May or June, not only makes sense, it will actually improve the application of technology in schools through comprehensive planning and integration with other important components necessary to provide a quality education for students.

The SECA petition states that technology planning and implementation in schools is “evolutionary not revolutionary”. This statement tends to describe technology planning in most schools and libraries. Districts usually set a vision for technology development and application for the instruction of students. The district then develops the strategies and action plans to carry out the vision. However, technology planning and application in schools tends to be driven by the emergence of new technologies rather than schools front-loading these developments. Therefore, schools consider updates and modifications to technology plans each year in conjunction with other planning in the district. Continually updating and making revisions to the development and implementation of technology in schools results in an evolutionary approach rather than revolutionary.

Our association, representing scores of rural schools and thousands of students across Montana, wholeheartedly supports the SECA petition to improve current regulations and practices concerning e-rate funding and ultimately the education of our students. The modification of these regulations will allow our schools to plan for technology in a more appropriate manner and in conjunction with other important components of education.

RESPECTFULLY SUBMITTED This 8th day of May, 2007

Dave Puyear, Director
Montana Rural Education Association